

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the application of : MITCHELL, Julian
Serial No. : 10/675,645
Filed : September 30, 2003
For : Media Proxy Having Interface to Multiple
Virtual Private Networks
Examiner : WHIPPLE, Brian P.
Art Unit : 2452
Customer No. : 23644
Confirmation No. : 6074

RESPONSE TO OFFICE ACTION DATED AUGUST 27, 2009

Honorable Director of Patents and Trademarks
PO Box 1450
Alexandria, VA 22313-1450

Dear Sir,

This response is being filed in view of the Examiner's further Office Action of August 27, 2009 regarding this application, which Office Action has been issued after the filing of a Request for Continued Examination.

The Examiner's new grounds for rejection of the application have been considered, and it is believed that the application has claims which are in condition for allowance as they presently stand. Therefore, no amendments are being offered and reconsideration is requested.

Claims 20-27, 29-31, 33-40, 42-43 and 45-47 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over the admitted prior art in view of Mott. According to the examiner, it would have been obvious to one of ordinary skill in the art at the time of the invention to modify the teachings of the APA (figure 2 of the present application) as taught by Mott to arrive at the claimed invention. Applicants respectfully disagree. Even if the teachings of Mott were to be combined with the teachings of the

APA, this would not lead to the subject matter of the claims presently on file, as is explained below.

Mott shows a VPN gateway shared by two VPN clients such as might reside on individual user devices. It does not show a VPN gateway shared by a plurality of VPNs, i.e. networks.

Mott, in paragraph 29 on page 3, describes the VPN gateway as a proxy "in that it serves as a replacement for the DNS server 218 the computer was originally intended to use". The "proxy" described by Mott is not a proxy as described in the pending claims.

Mott's "proxy" is specific to a single external entity, namely the DNS server. As such it is protocol specific. The DNS server is not a media endpoint and Mott's VPN gateway is not serving as a media proxy.

The person skilled in the art looking to improve the prior art admitted in the present application would not be likely to consider the teachings of Mott which operates on a completely different scale. The technical considerations in providing a gateway to be shared by several networks do not compare to the technical considerations involved in providing a gateway for a collection of user devices. Furthermore, a device performing the specific function of DNS server proxy as shown by Mott cannot simply be scaled up to provide a media proxy as described in claim 1. In particular, not only does the VPN media proxy described in claim 1 interface networks, but also it provides a plurality of virtual routing functions, respective ones of said virtual routing functions being connected to respective ones of said plurality of VPNs, all of which is described in more detail in claim 1.

The following additional considerations should be noted:

- Mott teaches how a single entity (VPN client on computer) accesses an external resource (the external DNS server from the ISP) but instead of accessing the external DNS, the VPN gateway intercepts the request and routes it to an internal resource (the intranet DNS server).
- This implies that the entity (VPN client) needs to be configured to access an external resource. The present invention explicitly does the inverse: it

maps an external resource to an internal (VPN) address, avoiding the complex firewall configuration issues.

- The invention of the present application allows all the entities in the VPN to access the resource. It avoids having each entity to be configured to deal with external resources.

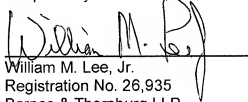
- Mott is directed to address resolution (DNS) and doesn't teach how to access any type of external resources as if they were internal resources.

- Mott describes how external entities (VPN clients) can access a specific internal entity (the VPN/intranet DNS server) using a specific protocol. The claimed invention teaches how internal entities (devices in the intranet/VPN) can reach out to several different external entities with any type of media (voice, video, music, etc.).

Due to what it is submitted to be the clear differences between the claimed invention and the prior art applied by the Examiner, it is submitted that the application, as claimed, is allowable thereover. The Examiner's further and favorable reconsideration of the application is therefore urged.

October 22, 2009

Respectfully submitted,



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